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Attorney for Debtor(s)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

BEVERLY ANN NORMAN

Debtors

§
§
§
§
§

CASE NO. 10-44252
CHAPTER 13

DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

TO THE HONORABLE JUDGE OF SAID COURT:

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS AN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 660 NORTH CENTRAL EXPRESSWAY, 3RD FLOOR, PLANO, TEXAS 75074, AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-EIGHT (28) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, DEBTOR(S), by this Motion filed by counsel, Len L. Nary, attorney, retained for the purpose of this Motion in the above-referenced case under Chapter 13 of Title 11 U.S.C., and pursuant to §1329, and file this Motion to Modify Chapter 13 Plan Post-Confirmation. This proposed Request for Modification of Debtor's Plan meets the requirements of §1322(a), (b) & (c) and §1325(a), and as grounds therefore, the Debtor(s) would show the Court the following:

HISTORY OF CASE

1. Debtor(s) filed this Chapter 13 case on 12/7/2010.
2. The Chapter 13 Plan was confirmed on 6/14/2011.

REASONS FOR MOTION TO MODIFY

3. Since confirmation of the plan, the Debtor has had multiple substantive changes to her life. She had a child, her husband began working very limited hours, and her health issues and costs recently increased substantially for a period of time. The Debtor made payments, but fell into arrears. This modification is to cure said arrears, and reset the remainder of her Chapter 13 plan payments based on changed circumstances. The modified plan will still return an approximately 25% unsecured dividend.

PROPOSED MODIFICATION

4. The Debtor(s) proposes that this Chapter 13 plan be modified per attached "MODIFICATION TO CHAPTER 13 PLAN OF DEBTORS", dated concurrent with this Motion. This document contains the details of the modification(s) to the Debtor's Chapter 13 Plan and the payment schedule thereunder as attached "EXHIBIT B".

5. Debtor(s) has retained Len L. Nary as counsel to file this Modification of the Chapter 13 Plan. Debtor(s) propose that attorney Len L. Nary be allowed legal fees for this Modification to Chapter 13 Plan, post-confirmation to be paid \$0.00 direct and \$650.00 to be paid in the Chapter 13 Plan.

WHEREFORE, the Debtor(s) pray for a Modified Chapter 13 Plan as described in the attached "Modification to Chapter 13 Plan" and an Order approving said Modification and prays

for such other and further relief as is just and proper.

Respectfully submitted:

/s/ Len L. Nary
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Attorney for Debtor

CERTIFICATE OF SERVICE

On this date, a true and correct copy of the foregoing Debtor's Motion to Modify Chapter 13 Plan Post-Confirmation, was noticed via electronic means where available or by first class mail, postage prepaid, to the following parties and to those parties listed on the attached matrix:

Trustee: CHAPTER 13 TRUSTEE
PO BOX 941166
PLANO, TX 75094-1166

Debtor: Beverly Ann Norman
1885 Trail Ridge Drive
Lewisville, Texas 75077

June 16, 2015

/s/ Len L. Nary
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Label Matrix for local noticing
0540-4
Case 10-44252
Eastern District of Texas
Sherman
Tue Jun 16 15:12:33 CDT 2015

ATTORNEY GENERAL
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BANKRUPTCY DIVISION
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Document
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Bankruptcy Processing
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Mason, OH 45040-8053

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Bank of America NA and Mbn America Bank
1000 Samoset Drive
DE5-023-03-03
Newark, DE 19713-6000

GE Money Bank
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25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605
Attn: Ramesh Singh

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CAROL STREAM, IL 60197-5253

HSBC BEST BUY
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UNITED STATES ATTORNEY
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eCAST Settlement Corporation
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eCAST Settlement Corporation, assignee
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POB 29262
New York, NY 10087-9262

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

CITIBANK SD, NA
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Michael Reed
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